

EXHIBIT 19

Filed Under Seal

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ATL 4842831 IN RE: PORK Civil No. 18-1776 (JRT/HB)
ANTITRUST LITIGATION,

0:21-md-02998-JRT-HB

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This Document Relates to: MDL No. 2998  
All Actions

REMOTE VIDEO DEPOSITION OF

CORWYN "CORY" BOLLUM

HIGHLY CONFIDENTIAL

December 1, 2021

9:45 a.m.

Suite 2200  
90 S. 7th Street  
Minneapolis, Minnesota

S. Julie Friedman, CCR-B-1476

1                   Would you agree with that?

2                   A.     It appears that way.

3                   Q.     And -- And you write a reply to Rebecca's  
4                   e-mail with some complaints about the report that she  
5                   provided on the cost data. Is that fair?

6                   A.     Yeah. Rebecca Roddy was a new accountant,  
7                   and so she was putting together some numbers and --  
8                   and reported them looking at what our hog cost was  
9                   relative to the Agri Stats hog cost report.

10                  And then I was just trying to point out to  
11                  her and use it as a teachable moment for her some  
12                  things that she wasn't necessarily looking at.

13                  Q.     And in response to your e-mail at the  
14                  bottom of the first page of this Exhibit 45, Paul  
15                  Bogle writes to you and says, "Cory, I asked Rebecca  
16                  to include the Agri Stats comparison. When it was  
17                  agreed to participate in Agristats, it was also  
18                  agreed we would not pick apart the numbers. We would  
19                  use the information for reference and strive to get  
20                  better."

21                  Do you see that?

22                  A.     Yeah.

23                  Q.     Do you have understanding of what Paul  
24                  meant when he said to you that it was agreed we would  
25                  not pick apart the numbers provided by Agri Stats?

1           A.       Again, Rebecca worked for Paul, and so  
2       Paul was a long-term Hormel employee, and so he -- he  
3       didn't like my evisceration of Rebecca very well and  
4       so was just reminding me that, again, we -- we --

5                       On this report, we look at our hog costs.  
6       We look at how we can reduce our hog cost.   That is  
7       my goal, that is our goal to reduce hog cost.

8                       To me, that's kind why it's interesting  
9       that we're a part of this lawsuit, when our goal here  
10      is to reduce hog cost; and I get chewed out multiple  
11      times in my career trying to reduce hog cost; and,  
12      yet, I'm being -- have the opportunity to be in  
13      this -- in this position.

14           Q.       Were you involved in the decision to --  
15      for Hormel to participate in Agri Stats?

16           A.       I had been involved with the decision to  
17      be a part of Agri Stats, and I've been a part of the  
18      decision to get out of Agri Stats.

19                       Again, there's -- there's times we try to  
20      utilize Agri Stats as an opportunity to benchmark how  
21      our primal yields and what -- how we were taking the  
22      carcass apart compared; and certainly, there's a lot  
23      of differences in -- in how -- how that information's  
24      put together, and so it's -- it's a -- It's an  
25      interesting concept.

1           Q.     I'm -- I would like to just ask you a  
2           question about -- going back to the question I asked  
3           earlier, which is when Mr. Bogle wrote to you when it  
4           was agreed to participate in Agri Stats, which you  
5           just testified you were part of that decision, it was  
6           also agreed we would not pick apart the numbers.

7                     And my question is: Do you have an  
8           understanding of what it means when Mr. Bogle said it  
9           was agreed we would not pick apart the numbers?

10          A.     Again, I'm referencing in the -- in this  
11          particular instance where some of my discussion to  
12          have a teachable moment to Rebecca Roddy was what he  
13          was referencing in that -- in that particular  
14          instance.

15          Q.     If I could ask you to look at Tab 37 of  
16          the binder in front of you.

17                   MR. MITCHELL: We'll mark that as  
18          Exhibit 46, which I think will be the last one  
19          from me today.

20                   (Plaintiff's Exhibit 46 was marked for  
21          identification.)

22          Q.     (By Mr. Mitchell) And that's a document  
23          Bates-stamped on the first page ending in 11420.

24                   Again, Tab 37, Exhibit 46, do you have  
25          that document in front of you?